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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FRANK LAPENA

Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, ET AL.

Defendants.

CASE No.: 2:21-cv-02170-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS  
MELVYN HARMON AND THE ESTATE  
OF MELVYN HARMON TO RESPOND  
TO PLAINTIFF'S MOTION FOR  
RECONSIDERATION OF ORDER  
GRANTING DEFENDANTS' MELVYN  
HARMON AND THE ESTATE OF  
MELVYN HARMON'S MOTION TO  
DISMISS [ECF NO. 153]**

**[FIRST REQUEST]**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff FRANK LAPENA (hereinafter "Plaintiff") by and through his counsel of record, Kristina Wildeveld, Esq., Lisa Rasmussen, Esq., and Richard Bryant, Esq. from the Law Offices of Kristina Wildeveld & Associates and Defendants MELVYN HARMON ("Mr. Harmon") and THE ESTATE OF MELVYN HARMON (the "Harmon Estate") (collectively, the "Harmon Defendants") by and through their counsel of record, Jonathan D. Blum, Esq. of Wiley Petersen, to extend the time for the Harmon Defendants to file a response to Plaintiff's Motion for Reconsideration of Order Granting Defendants' Melvyn Harmon and the Estate of Melvyn Harmon's Motion to Dismiss, ECF No. 153 (the "Motion"). The Motion was filed on December 22, 2023, and no hearing date has been scheduled. The parties respectfully request the Court enter an order extending the deadline for the Harmon Defendants' to file a response to the Motion by two weeks, to January 19, 2024.

The Motion is 26 pages, attaches 20 exhibits and is substantive. Counsel for the Harmon Defendants was travelling out of state for the holidays for most of the week following the filing of the Motion. Further, among other time sensitive matters, a hearing on a motion seeking a temporary restraining order has been set in another matter on January 5, 2024, requiring a great deal of time. As such, he requests an additional two weeks to respond to the Motion. Counsel for Plaintiff does not object to the extension. This stipulated extension is for good cause, made in good faith and not for improper delay.

DATED this 29 day of December, 2023.

**WILEY PETERSEN**

  
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 and the Estate of Melvyn Harmon*

DATED this 29 day of December, 2023.

**THE LAW OFFICES OF KRISTINA A  
 WILDEVELD & ASSOCIATES**

/s/ Lisa Rasmussen  
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*Attorneys for Plaintiff Frank LaPena*

**ORDER**

**IT IS SO ORDERED.**

**DATED:** January 5, 2024

  
**UNITED STATES DISTRICT JUDGE**